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IN RE APPLICATION OF	:
EGGLESTON, ET AL.	: EXAMINER: CARDONE, J.
SERIAL NO: 09/095,325	:
FILED: JUNE 10, 1998	: GROUP ART UNIT: 2145
FOR: METHOD AND APPARATUS FOR RATE GOVERNING COMMUNICATIONS	:

37 CFR 41.202 SUGGESTION OF AN INTERFERENCE

COMMISSIONER FOR PATENTS
ALEXANDRIA, VIRGINIA 22313

SIR:

In response to the September 26, 2005 Request for Information, applicants hereby suggest an interference as shown below.

I. 37 CFR 41.202(a)(1)

The applicants seek an interference with U.S. patent Nos. 6,219,694, 6,389,457, 6,401,113, and 6,701,378 to Lazaridis et al.

II. 37 CFR 41.202(a)(2)

A. Proposed Count and Claim Correspondence

Applicants believe that its claims 33-114 interfere with Lazaridis's claims 1-36 of the '694 patent, claims 1-12 of the '457 patent, claims 1-34 of the '113 patent, and claims 5, 8-23, 25-33, 35-50, and 52-58 of the '378 patent.

Applicants propose the following count:

Applicants' claim 60

OR

claim 28 of the Lazaridis '694 patent.

B. Why Claims 1-36 of the '694 Patent Should Be Designated as Corresponding to the Proposed Count

Claim 28 of the Lazaridis '694 patent corresponds exactly to the proposed count. Further, claims 24 and 33 of the '694 Lazaridis patent are computer system and computer readable medium analogs, respectively, of the count and thus should correspond to the proposed count.

Regarding the remaining independent claims 1, 22, 23, and 32 of the Lazaridis '694 patent, U.S. patent No. 6,052,563 to Macko[1] teaches each feature of those claims with the exception of the transparency feature defined by the proposed count. For example, Macko discloses a method of redirecting data items from a host system (130) to a mobile communication device (100). The host system configures one or more redirection events (column 8 lines 61-63); detects that a redirection event has occurred; generates a redirection trigger; and, in response to the trigger, continuously redirects the data items from the host system to the communication device (column 8 line 67 - column 9 line 4). It would have been obvious to a person of ordinary skill in the art during the 1998 time frame to modify the method steps defined by the count to include the redirection feature taught by Macko because Macko realized the benefit of forwarding e-mail to a mobile device when the user of the mobile device is away from his desktop computer. See column 8 line 57 - column 9 line 4 of Macko.

Independent claim 24 of the Lazaridis '694 patent is the computer system analog of claim 28 and independent claim 33 is the computer readable medium analog of claim 28.

[1] A copy of the Macko patent is attached hereto under Tab A.

Consequently, claims 24 and 33 of the Lazaridis '694 patent define the same patentable invention as the count.

Claim 2 of the Lazaridis '694 patent depends from claim 1. Claim 2 recites the step of "storing information regarding the configuration of the mobile data communication device at the host system." The AirMobile Communication Client Guide (hereinafter "AirMobile")[2] teaches on page 10 that a User Profile Database including one or more entries defining mobile user configuration information exists on a Communication server. It would have been obvious to a person of ordinary skill in the art during the 1998 time frame to modify the method steps defined by the count to include the configuration information feature taught by AirMobile to enable users to change and store their user preferences and configuration information because each user has his or her own preferences and preferred configuration.

Claim 3 of the Lazaridis '694 patent depends from claim 2. Claim 3 further recites that the configuration information stored at the host system includes (a) the network address of the mobile communication device and (b) an indication of the types of message attachments that the mobile data communication device can receive and process. Page 15 of AirMobile states that the AirMobile Profile Editor enables users to configure the AirMobile software with system configuration information including wireless radio addresses. Further, page 10 of AirMobile discloses that users can control whether text or binary attachments can be received. It would have been obvious to a person of ordinary skill in the art during the 1998 time frame to modify the method steps defined by claim 2 and the proposed count to include this specific configuration information taught by AirMobile to enable users to change and store their user preferences (re attachments) and configuration information (re address information).

[2] A copy of the AirMobile publication is attached hereto under Tab B.

Claim 4 of the Lazaridis '694 patent depends from claim 3. Claim 4 further recites that the configuration information further includes an indication of the type of mobile data communication device. AirMobile teaches on page 18 that some wireless modems and adapters have identification numbers in normal numerical format (type 1) while others provide their ID numbers in hexadecimal format (type 2). It would have been obvious to a person of ordinary skill in the art during the 1998 time frame to modify the method steps defined by claim 3 and the proposed count to include this specific configuration information taught by AirMobile to enable communication with the wireless device.

Claim 5 of the Lazaridis '694 patent depends from claim 3. Claim 5 further recites the steps of: (a) for each message to be redirected, determining whether the message includes an attachment, (b) if so, then determining the type of attachment; (c) accessing the stored configuration information at the host system to determine whether the mobile data communication device can receive and process attachments of the determined type; (d) if so, then redirecting the attachments to the mobile data communication device, and, (e) if not, then redirecting the attachments to a device that is capable of processing the attachment. AirMobile teaches on page 45 that mobile users have the option to download all file attachments which pass all other filters or to strip off attachments and to forward the same to the user's LAN-based Inbox. It would have been obvious to a person of ordinary skill in the art during the 1998 time frame to modify the method steps defined by claim 3 and the proposed count to handle attachments in such a manner in order to address bandwidth issues --which were already well known.

Claim 6 of the Lazaridis '694 patent depends from claim 5 and further recites that the attachment is a sound file. AirMobile teaches on page 45 that spreadsheet, word-processing, and graphic files are common examples of attachments. AirMobile does not expressly identify sound files. However, a 1996 publication by Arnum entitled "The Universal

Mailbox Arrives ... sort of" teaches an e-mail system wherein files including sound files can be attached to e-mail messages.[3] It would have been obvious to a person of ordinary skill in the art during the 1998 time frame to include sound files as a type of attachment which could be forwarded by the method steps recited in claim 5 and the proposed count because most mobile devices already had speakers designed to reproduce sound.

Claim 7 of the Lazaridis '694 patent depends from claim 1 and further recites the steps of "determining whether the receiver address is associated with the mobile data communication device; if the receiver address is associated with the mobile data communication device, then determining a network address of the mobile data communication device and repackaging the messages into electronic envelopes addressed using the receiver address and the network address of the mobile data communication device; and, after receiving the redirected messages at the mobile data communication device, extracting the messages from the electronic envelopes and displaying the messages at the mobile data communication device using the sender address and the receiver address, so that it appears as though the mobile data communication device is the host system."

The AirMobile publication teaches on page 5 that the AirMobile software enables a user to connect to a traditional mail server located at the user's office so that the user can upload and download messages using his mobile device. Because of the transparency feature of the count, e-mails received at the user's mail server must be repackaged (i.e., configured to be forwarded) and sent to the mobile device's radio address and unpackaged by the mobile device upon receipt. Hence, it would have been obvious to a person of ordinary skill in the art during the 1998 time frame to modify the steps recited in claim 1 and the proposed count to include the packaging feature recited in claim 7.

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[3] A copy of the Arnum publication is attached hereto under Tab C.

Claim 8 of the Lazaridis '694 patent depends from claim 1 and further recites that "the redirection events include external events, internal events, or networked events." AirMobile teaches on page 37 that a mobile user can send a registration to the Communication server which will trigger the Communication server to push messages to the mobile user. It would have been obvious to a person of ordinary skill in the art during the 1998 time frame to enable external events to trigger the start of the e-mail pushing process because users may need to initiate the process when they do not have access to their e-mail server.

Claim 9 of the Lazaridis '694 patent depends from claim 8 and further recites that the external event is a message from the mobile device. The subject matter defined by claim 9 would have been obvious to a person of ordinary skill in the art during the 1998 time frame in view of claim 1 and the count for the same reasons that the subject matter defined by claim 8 would have been obvious in view of claim 1 and the count.

Claim 10 of the Lazaridis '694 patent depends from claim 8 and further recites that "the internal event is a calendar alarm." Macko discloses at column 8 line 28 that the redirection event can be a calendar alarm (i.e., an appointment). It would have been obvious to a person of ordinary skill in the art during the 1998 time frame to enable internal events such as a calendar alarm to trigger the start of the e-mail pushing process because users may need to initiate the process when they are scheduled to be away from the office.

Claims 11 and 35 of the Lazaridis '694 patent depend from claims 8 and 35, respectively, and further recite that "the internal [redirection] event is a screen saver activation [signal]." U.S. patent No. 5,819,284 to Farber[4] teaches utilizing a screen saver activation as a redirection event for obtaining information "feeds" that are stored at a real-time information display system. It would have been obvious to a person of ordinary skill in

[4] A copy of the Farber patent is attached hereto under Tab D.

the art during the 1998 time frame to enable internal events such as activation of a screen saver to trigger the start of the e-mail pushing process because activation of the screen saver often reflects that the user is away from his desktop computer.

Claim 12 of the '694 Lazaridis patent depends from claim 8 and further recites that "the internal event is a keyboard timeout signal." Japanese patent publication No. JP9305155[5] discloses that a screensaver can be activated by a keyboard time-out signal. Hence, in view of the Farber teaching discussed in the above paragraph, it would have been obvious to a person of ordinary skill in the art during the 1998 time frame to enable internal events such as a keyboard timeout signal to trigger the start of the e-mail pushing process because the keyboard timeout signal often reflects that the user is away from his desktop computer.

Claim 13 of the '694 Lazaridis patent depends from claim 8 and further recites that "the networked events include messages to begin redirection from computer systems other than the mobile data communication device, which are connected to the host system via a wired network." The Systems for Automated Messages Reference Manual (hereinafter referred to as "SAM")[6] teaches on page 12-5 that the SAM system provides functionality where one user can change the message routing of another user's messages. Consequently, it would have been obvious to a person of ordinary skill in the art during the 1998 timeframe to modify the method defined by the proposed count to begin redirection of e-mails in response to messages originated at computer systems other than the mobile communication device of the user. Routing functionality of this nature enables redirection of messages to be initiated by administrators and the like.

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[5] A copy of the Japanese patent publication No. JP9305155 is attached hereto under Tab E.
[6] A copy of the Sam publication is attached hereto under Tab F.

Claim 14 of the '694 Lazaridis patent depends from claim 1 and further recites that "the mobile data communication device is a pager." Macko discloses at column 1 lines 13-15 and column 2 lines 5-7 that a mobile device can be a pager. It would have been obvious during the 1998 time frame to a person of ordinary skill in the art to modify the subject matter defined by the count to limit the mobile devices to pagers because pagers were well known mobile devices able to transmit and receive messages.

Claim 15 of the '694 Lazaridis patent depends from claim1 and further recites that "the mobile data communication device is a device equipped to receive both voice and non-voice data messages." Macko discloses at column 2 lines 13-15 that a mobile device can be a device configured to receive both voice and non-voice data messages. It would have been obvious during the 1998 timeframe to a person of ordinary skill in the art to modify the subject matter defined by claim 1 and the count to limit the mobile devices to devices configured to receive both voice and non-voice data messages because cell phones with these capabilities were well known mobile devices able to transmit and receive messages.

Claim 16 of the Lazaridis '694 patent depends from claim 1 and recites "the host system includes a preferred list for limiting the redirection step to redirecting only those messages that are transmitted to the host system from a sender on the preferred list." AirMobile teaches on page 42 that messages can be filtered by "author" or "Post Office." It would have been obvious during the 1998 time frame to a person of ordinary skill in the art to modify the subject matter defined by claim 1 and the proposed count to limit messages forwarded to the mobile device in view of the author of the message because such filtering is critical when limited bandwidth is available to the mobile user.

Claim 17 of the Lazaridis '694 patent depends from claim 16 and recites "a user can add and subtract senders from the preferred list." Pages 41-43 of AirMobile describe that users can configure the message filtering criteria. It would have been obvious during the

1998 time frame to a person of ordinary skill in the art to modify the subject matter defined by claim 16 and the proposed count to allow users to set the criteria for filtering messages because such filtering is critical when limited bandwidth is available to the mobile user.

Claim 18 of the Lazaridis '694 patent depends from claim 17 and recites "the user can add and subtract senders from the preferred list by configuring the host system." Pages 41-43 of AirMobile describe that users can configure the message filtering criteria at the host system. It would have been obvious during the 1998 time frame to a person of ordinary skill in the art to modify the subject matter defined by claim 17 and the proposed count to allow users to set the criteria for filtering messages via the host system because such filtering is critical when limited bandwidth is available to the mobile user.

Claim 19 of the Lazaridis '694 patent depends from claim 17 and recites "the user can add and subtract senders from the preferred list by transmitting a command message from the mobile data communication device to the host system." U.S. patent No. 6,157,630 to Adler et al.[7] describes in column 6 lines 51-64 that users of a mobile device can decide which messages are to be forwarded to the mobile device based on who the sender is. It would have been obvious during the 1998 time frame to a person of ordinary skill in the art to modify the subject matter defined by claim 17 and the proposed count to allow users to set the criteria for filtering messages via the mobile device because such filtering is critical when limited bandwidth is available to the mobile user.

Claim 20 of the Lazaridis '694 patent depends from claim 16 and recites that "the preferred list is activated and deactivated at the host system." Figure 4-1 of AirMobile illustrates that the user is able to activate and deactivate filters at the host system by selecting or deselecting a plurality of rules including a rule for filtering based on authorship. It would have been obvious during the 1998 time frame to a person of ordinary skill in the art to

[7] A copy of the Adler patent is attached hereto under Tab G.

modify the subject matter defined by claim 16 and the proposed count to allow users to activate or deactivate the rules for filtering messages via the host system because such filtering is critical when limited bandwidth is available to the mobile user.

Claim 21 of the Lazaridis '694 patent depends from claim 16 and recites "the preferred list is activated and deactivated by a command message transmitted from the mobile data communication device to the host system." Adler describes in column 6 lines 51-64 that users of a mobile device can activate the preferred list of senders that the users wishes to have messages forwarded to the mobile device based on who the sender is. It would have been obvious during the 1998 time frame to a person of ordinary skill in the art to modify the subject matter defined by claim 16 to allow users to activate such a preferred list for filtering messages via the mobile device because such filtering is critical when limited bandwidth is available to the mobile user.

Claims 25 and 30 of the Lazaridis '694 patent depend from claims 24 and 29, respectively, and recite "a from e-mail address field in the configured received message is the message sender's e-mail address associated with the host system." In order to employ the transparency feature of the proposed count, it would have been understood by a person of ordinary skill in the art during the 1998 time frame that the from e-mail address field of the configured message would be the message sender's e-mail address associated with the host system.

Claims 26 and 31 of the Lazaridis '694 patent depend from claims 25 and 30, respectively, and recite "a reply-to e-mail address field in the configured received message is the message sender's e-mail address associated with the host system." Section 4.4.3 of RFC

822[8] teaches that the "reply-to" field provides a general mechanism for indicating any mailbox(es) to which responses are to be sent. Hence, configuring the "reply-to" e-mail address field in the configured received message to be the message sender's e-mail address associated with the host system would have been obvious to a person of ordinary skill in the art during the 1998 time frame in view of the subject matter defined by the proposed count and claims 25 and 30.

Claim 27 of the Lazaridis '694 patent depends from claim 26 and further recites "a descriptor added to the configured received message to indicate to the message recipient that the message was generated at the mobile data communications device instead of the host system." Section 4.4.2 of RFC 822 teaches that a "sender" field can be used to identify the sender if the sender is not the same entity identified by the "from" field. Hence, adding a descriptor to the configured received message to indicate to the message recipient that the message was generated at the mobile device instead of the host system would have been obvious during the 1998 time frame in view of the subject matter defined by the proposed count and claim 27. Although this feature nullifies the intent of the transparency feature recited by the proposed count, it still would have been an obvious feature to add to the subject matter defined by the proposed count if the purpose of that subject matter, for example, was to convey to the recipient of the message that the sender was not at his desktop computer, but rather was away from his desk at a remote site. Hence, claim 27 should be designated as corresponding to the proposed count.

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[8] Lazaridis et al. state at column 10 lines 53-57 that their preferred industry standard mail protocol includes RFC 822. A copy of that standard is attached hereto under Tab H. RFC 822 is dated August 13, 1982.

Claim 29 of the Lazaridis '694 patent depends from claim 28 and recites "the message sender's first address is an e-mail address associated with the host system." RFC 822 states in section 1.1 that it is intended strictly as a definition of what message content format is to be passed between hosts within the framework of electronic mail. Hence, associating the message sender's first (e-mail) address with the host system would have been obvious in view of the subject matter of the proposed count during the 1998 time frame.

Claim 34 of the Lazaridis '694 patent depends from claim 33 and further recites the steps of: "configuring one or more redirection events at the host system; detecting that a redirection event has occurred at the host system and generating a redirection trigger; and continuously redirecting messages received at the host system to the mobile data communication device." AirMobile discloses on page 31 that messages are "pushed" from the server to the mobile device without the users having to call in to check for messages. Hence, it would have been obvious to a person of ordinary skill in the art during the 1998 time frame to modify the subject matter of claim 33 and the count such that messages are continuously redirected from the host system to the mobile data communication device because such a configuration eliminates unnecessary communication between the client and the server which minimizes communication costs and artificial delivery delays.

Claim 36 of the Lazaridis '694 patent depends from claim 34 and further recites the steps of "configuring one or more message filters at the host system; and filtering received messages at the host system using the one or more message filters prior to redirecting messages to the mobile data communication device." Pages 41-43 of AirMobile describe that users can configure the message filtering criteria at the host system. It would have been obvious during the 1998 time frame to a person of ordinary skill in the art to modify the subject matter defined by claim 17 and the proposed count to allow users to set the criteria for

filtering messages via the host system because such filtering is critical when limited bandwidth is available to the mobile user.

C. Why Claims 1-12 of the '457 Patent Should Be Designated as Corresponding to the Proposed Count

Independent claims 1, 6, and 10 of the '457 patent define the same transparency feature as the proposed count. Further, each of those claims define that the computer (host) system causes the outgoing data items to be sent to the network (i.e., the outgoing data items are pushed to the mobile device). AirMobile discloses on page 31 that messages are "pushed" from the server to the mobile device without the users having to call in to check for messages. Hence, it would have been obvious during the 1998 time frame to modify the subject matter of the proposed count such that messages are continuously redirected from the host system to the mobile data communication device because such a configuration eliminates unnecessary communication between the client and the server which minimizes communication costs and artificial delivery delays.

Claims 2 and 9 of the Lazaridis '457 patent depend from claims 1 and 6, respectively, and further recite "the common [electronic] address is an e-mail address." RFC 822 states in section 1.1 that it is intended strictly as a definition of what message content format is to be passed between hosts within the framework of electronic mail. Hence, limiting the common address to an e-mail address associated with the host system would have been obvious to a person of ordinary skill in the art of in view of the subject matter of the proposed count and claims 1 and 6 during the 1998 time frame.

Claim sets {3, 4}, {7, 8} and {11, 12} of the Lazaridis '457 patent depend from claims 1, 6, and 10, respectively, and require encryption/decryption of data items sent to and from the mobile data communication device. RFC 822 specified in section 4.7.3 that the body of an e-mail could be encrypted. In order to decrypt the message contents, RFC 822

taught that the sender could identify the encryption algorithm and optionally could aid the recipient in selecting the proper decryption key. It would have been obvious during the 1998 time frame to modify the subject matter defined by the proposed count and claims 1, 6, and 10 to include the steps of encryption/decryption of data items sent to and from the mobile data communication device in order to increase the security of the message contents.

Claim 5 of the Lazaridis '457 patent depends from claim 1 and further recites the steps of: "packaging into electronic envelopes the data items prior to redirecting them; and unpackaging from electronic envelopes the data items sent from the mobile communication devices." AirMobile teaches in its Preface that the AirMobile software implements a wireless transport and application protocol. A person of ordinary skill in the art during the 1998 time frame would have known that, in order to implement the steps of the proposed count, the data items would have been packed into an "envelope" for transport, unpackaged at the mobile communication device, and vice versa.

D. Why Claims 1-34 of the '113 Patent Should Be Designated as Corresponding to the ProposedCount

Independent claims 1 and 19 of the Lazaridis '113 patent define the same transparency feature as the proposed count. However, independent claims 1 and 19 are directed to the wireless mobile communication device and how it implements the transparency feature using a push configuration.[9] In contrast thereto, the proposed count is directed to the method steps completed at the host system for implementing the transparency feature. Adler illustrates in Figure 4 a mobile device 200 including a receiver for receiving redirected messages from a mobile device, a memory for storing the redirected messages, and a controller 405 for generating reply messages 407 to the redirected messages. It would have

[9] See section II. C above regarding why a "push" configuration would have been obvious in view of the proposed count.

been obvious to a person of ordinary skill in the art during the 1998 time frame to use a mobile device as described by Adler to implement the steps defined by the proposed count.

Claim 2 of the Lazaridis '113 patent depends from claim 1 and further defines that the mobile device includes "a redirector component for redirecting messages received at the mobile communications device to the first computer system." Independent claim 17 also defines that the mobile device includes a redirector component. Column 4 lines 46-56 of the Lazaridis '113 patent states that, if both the host and the mobile device operate pursuant to a redirector program, then two-way pushing of information from the host to the mobile device can be implemented. AirMobile describes on page 31 that the client mobile device when running the AirMobile software can *immediately* deliver e-mail (i.e., push) from the outbox of the mobile device to the host system. Hence, it would have been obvious to a person of ordinary skill in the art during the 1998 time frame to modify the subject matter of the proposed count and claim 1 to use a mobile device having redirector software because immediate delivery of e-mail is expected by users unless the wireless connection is unobtainable or expensive.

Claim 18 of the Lazaridis '113 patent depends from claim 17 and further defines "means for configuration [sic; configuring] one or more redirection events at the mobile communications device; means for detecting that a redirection event has occurred at the mobile communications device and for generating a redirection trigger; and means in response to the redirection trigger, for continuously redirecting messages from the mobile communications device to the first computer system." The Lazaridis '113 patent teaches in column 10 lines 47-60 that (a) the means for configuration [sic; configuring], (b) the means for detecting, and (c) the means for redirecting collectively correspond to redirector software 12. The AirMobile software enables pushing of e-mail messages once the mobile device has registered (i.e., configured) with the host system, maintains a connection with the host system

without maintaining a session (i.e., detects when e-mails should be pushed to the host system), and pushes e-mails from the outbox of the mobile device to the host system. Hence, it would have been obvious to a person of ordinary skill in the art during the 1998 time frame to modify the subject matter of the proposed count and claim 17 to use a mobile device having redirector software.

Claims 3 and 4 of the Lazaridis '113 patent both depend from claim 1. Claim 3 defines that the mobile communications device includes a display for displaying images, and claim 4 recites that "the wireless mobile communication device is a device selected from the group consisting of a hand-held wireless paging computer, a wirelessly enabled palm-top computer, a mobile telephone with data messaging capabilities and a wirelessly enabled laptop computer." Figure 1-1 of AirMobile illustrates a wirelessly enabled computer having a display. It would have been obvious to a person of ordinary skill in the art during the 1998 time frame to use a laptop having a display and wireless communication to implement the steps of the proposed count.

Claim 5 of the Lazaridis '113 patent depends from claim 1 and further defines that the wireless mobile communication device further includes "an unpackaging module for removing the redirected messages from the electronic envelopes." Because of the transparency feature of the count, e-mails received at the user's mail server must be repackaged (i.e., configured to be forwarded) and sent to the mobile device's radio address and unpackaged by the mobile device upon receipt. Hence, it would have been obvious to a person of ordinary skill in the art during the 1998 time frame to modify the subject matter of the proposed count to include the repackaging feature.

Claim 6 of the Lazaridis '113 patent depends from claim 1 and further recites "the redirector component includes: means for configuring one or more redirection events at the first computer system; means for detecting that a redirection event has occurred at the first

computer system and for generating a redirection trigger; and means, responsive to the redirection trigger, for continuously redirecting messages, as they are received, from the first computer system to the wireless mobile communications device." AirMobile discloses on page 31 that messages are "pushed" from the server to the mobile device without the user having to call in to check for messages. Hence, it would have been obvious to a person of ordinary skill in the art during the 1998 time frame to modify the subject matter of the proposed count such that messages are continuously redirected from the host system to the mobile data communication device because such a configuration eliminates unnecessary communication between the client and the server which minimizes communication costs and artificial delivery delays.

Claim 7 of the Lazaridis '113 patent depends from claim 1 and further recites "the wireless mobile communication device is configured to receive both voice and non-voice messages." Macko discloses at column 2 lines 13-15 that a mobile device can be a device configured to receive both voice and non-voice data messages. It would have been obvious during the 1998 time frame to a person of ordinary skill in the art to modify the subject matter defined by the proposed count to limit the mobile devices to devices configured to receive both voice and non-voice data messages because cell phones with these capabilities were well known mobile devices able to transmit and receive messages.

Claim 8 of the Lazaridis '113 patent depends from claim 1 and further defines "a command generator for generating one or more commands that control the wireless redirector component, wherein the transmitter transmits the one or more commands from the wireless mobile communications device to the first computer system." Adler describes in the passage found at column 6 line 51 - column 7 line 15 that the mobile device 200 can set rules for defining the messages or forms of messages or types of messages that the user of the radio device wishes to receive. The rules are sent to the command message receiver 465 of the host

system. It would have been obvious to a person of ordinary skill in the art during the 1998 time frame to use a mobile phone having a command generator for generating commands that control the filtering of potential redirected messages in order to implement the steps of the proposed count because users may change their filtering preferences when they are away from their desktop computer.

Claim 9 of the Lazaridis '113 patent depends from claim 8 and further recites that "the one or more commands include a command to enable the wireless redirector component." AirMobile teaches on page 37 that a mobile user can send a registration to the Communication server which will trigger the Communication server to push messages to the mobile user. It would have been obvious during the 1998 time frame to enable external events to trigger the start of the e-mail pushing process in view of the count and claim 8 because users may need to initiate the process when they do not have direct access to their e-mail server.

Claims 10 and 11 of the Lazaridis '113 patent depend from claim 8 and further recite that "the one or more commands include a command to enable a preferred list function at the wireless redirector component, wherein the preferred list function limits message redirection to a set of message senders stored in a preferred list at the first computer system" and "the one or more commands include a command to add or subtract message senders from the preferred list," respectively. AirMobile teaches on page 37 and 45 that, once the mobile client registers with the server, the client may send profile change transactions including filtering parameters. It would have been obvious to a person of ordinary skill in the art during the 1998 time frame in view of the count and claim 8 to enable users to modify their filtering rules when they do not have direct access to their e-mail server.

Claim 12 of the Lazaridis '113 patent depends from claim 8 and further recites that "the one or more commands include a command that instructs the first computer system to

route a message attachment to an external device." SAM discloses on pages 12-1 and 12-2 a system which enables messages to be routed to a plurality of alternate locations including external devices such as a printer or a fax. Routing functionality of this nature enables messages to be redirected depending on the hardware in use by the user. Consequently, it would have been obvious to a person of ordinary skill in the art during the 1998 time frame to modify the method defined by the count and claim 8 to route redirected message attachments to an external device.

Claim 13 of the Lazaridis '113 patent depends from claim 1 and further defines "a decryption module for decrypting the encrypted messages redirected from the first computer system." RFC 822 specified in section 4.7.3 that the body of an e-mail could be encrypted. In order to decrypt the message contents. RFC 822 also taught in section 4.7.3 that the sender could identify the encryption algorithm and optionally could aid the recipient in selecting the proper decryption key. It would have been obvious to a person of ordinary skill in the art during the 1998 time frame in view of the count and claim 1 to use a mobile telephone including a decryption module to decrypt data items sent to the mobile data communication device in order to increase the security of the message contents.

Claim 14 of the Lazaridis '113 patent depends from claim 1 and further recites that "the one or more commands include a command that causes the first computer system to execute a search and retrieval operation on a remote database." Claim 15 of the Lazaridis '113 patent depends from claim 14 and further recites that "a result from the search and retrieval operation is returned to the wireless mobile communications device via the wireless redirector component." Claims 14 and 15 of the Lazaridis '113 patent are indefinite because claim 1 does not recite "one or more commands."

Further, U.S. patent No. 5,974,447 to Cannon et al.[10] discloses a system for coupling a wireless communication device 18 to sources of information via a server 22. The information retrieved is customized (searched) by the user. See Figure 1 and column 2 line 39 - column 3 line 29. It would have been obvious to a person of ordinary skill in the art during the 1998 time frame to modify the subject matter of the count and claim 1 such that information obtained from a search and retrieval of a remote database is returned to the communication device via the wireless redirector component.

Because of the indefinite scope of claims 14 and 15 and in view of the teachings of the Cannon et al. patent, those claims should be designated as corresponding to the proposed count.

Claim 16 of the Lazaridis '113 patent depends from claim 1 and further recites that "the first electronic address is an e-mail address associated with the user of the wireless mobile communications device." RFC 822 states in section 1.1 that it is intended strictly as a definition of what message content format is to be passed between hosts within the framework of electronic mail. Hence, associating the message sender's (i.e., user's) first (e-mail) address with the host system would have been obvious to a person of ordinary skill in the art during the 1998 time frame in view of the subject matter of the proposed count and claim 1.

The subject matter defined by claims 20-34 would have been obvious to a person of ordinary skill in the art during the 1998 time frame in view of the subject matter defined by the count for the same reasons that the subject matter defined by claims 2-16 would have been obvious.

[10] A copy of the Cannon et al. patent is attached hereto under Tab I.

E. Why Claims 5, 8-33, and 35-58 of the '378 Patent Should Be Designated as Corresponding to the ProposedCount

Independent claims 5 and 33 of the Gulhuly (Lazaridis) '113 patent define the same transparency feature as the proposed count. However, those claims also recite (a) that the message being transmitted by the wireless device is an original message as opposed to a reply message and (b) that two copies of the message are generated for redirecting. The first copy is addressed to the message recipient as defined by the proposed count and the second copy is addressed to a first electronic mail account of a messaging host system associated with the wireless device, wherein the second copy is addressed as originating from the wireless device. The second copy is transmitted to the messaging host system where the second copy is stored in the first electronic mail account.

Airmobile teaches that the wireless devices were configured to generate original messages as well as reply messages.

U.S. Patent No. 5,764,899 to Eggleston et al.[11] teaches at column12 lines 55-62 reconstructing at a host system a reply message generated at a wireless device to include preceding messages and sending a copy of the reconstructed reply message to target units and to the client's post office box.

Finally, RFC 822 teaches in sections 4.4.1 and 4.4.2 "From" and "Sender" fields for the format of Internet text messages. The "From" field identifies "the person(s) who wished [the] message to be sent. The message-creation process should default this field to a single, authenticated machine address, indicating the AGENT (person, system or process) *entering the message*." Italics added for emphasis. In contrast, the "Sender" field identifies "the single AGENT (person, system or process) *responsible for sending the mail* and not simply include the name of a mailbox from which the mailbox was sent." Italics added for emphasis.

[11] A copy of the Eggleston patent is attached hereto under Tab J.

In view of the foregoing, a person of ordinary skill in the art during the 1998 time frame would have known (a) to modify the subject matter of the proposed count to generate original messages as well as reply messages and (b) to send copies of the original message to both the first electronic mail account associated with the user and to the targeted recipient[s]. Further, it would have been obvious to a person of ordinary skill in the art during the 1998 time frame (c) to utilize the "From" field to identify the first electronic mail account of the system in view of the transparency feature defined by the proposed count when sending the copy to the targeted recipient, and (d) to utilize the "Sender" field to identify the wireless device as the originator of the original message because it would be useful to the author (i.e., the user) of the original message to have a record that his or her message was generated at his or her wireless device as opposed to his or her desktop computer.

Claim 8 and its system analog claim 36 of the Lazaridis '378 patent depend from claims 5 and 33, respectively, and recite "receiving a message at the first electronic mail account from an external source; detecting the message in the first electronic mail account; forwarding a copy of the message to the wireless redirector host system; determining whether the message should be redirected from the wireless redirector host system to the wireless device; and if the message should be redirected, then packaging the message into an electronic envelope and transmitting the electronic envelope to the wireless device." Macko discloses a method of redirecting data items from a host system (130) to a mobile communication device (100). The host system configures one or more redirection events (column 8 lines 61-63); detects that a redirection event has occurred; generates a redirection trigger; and, in response to the trigger, continuously redirects the data items from the host system to the communication device (column 8 line 67 - column 9 line 4). It would have been obvious to a person of ordinary skill in the art during the 1998 time frame to modify the method steps defined by the count to include the redirection feature taught by Macko because

Macko realized the benefit of forwarding e-mail to a mobile device when the user of the mobile device is away from his desktop computer. See column 8 line 57 - column 9 line 4 of Macko.

Further, AirMobile teaches on page 42 that messages can be filtered by "author" or "Post Office." It would have been obvious during the 1998 time frame to a person of ordinary skill in the art to modify the subject matter defined by the proposed count and claims 5 and 35, respectfully, to limit messages forwarded to the mobile device in view of, for example, the author of the message because such filtering is critical when limited bandwidth is available to the mobile user.

Claim 9 and its system analog claim 37 depend from claims 8 and 36, respectively, and recite "determining whether a new message has been received at the first electronic mail account; and checking a forwarding file coupled to the messaging host system to determine whether to redirect the new message to the wireless redirector host system." It would have been obvious during the 1998 time frame to a person of ordinary skill in the art in view of the count and claims 8 and 36 to use a "forwarding file" as the basis for filtering.

Claim 10 and its system analog claim 38 depend from claims 9 and 37, respectively, and recite "the forwarding file includes a list of system addresses where the new message should be forwarded by the messaging host system." SAM discloses on pages 12-1 and 12-2 a system which enables messages to be routed to a plurality of alternate locations including external devices such as a printer or a fax. Routing functionality of this nature enables messages to be redirected depending on the hardware in use by the user. Consequently, it would have been obvious to a person of ordinary skill in the art during the 1998 time frame to modify the method defined by the count and claims 9 and 37 to route redirected message to a plurality of system addresses provided on a list.

Claim 11 of the '378 patent depends from claim 8 and further recites "receiving the electronic envelope at the wireless device; extracting the message from the electronic envelope; and storing the message within the memory of the wireless device." AirMobile teaches on page 5 that the AirMobile software enables a user to connect to a traditional mail server located at the user's office so that the user can upload and download messages using his mobile device. Because of the transparency feature of the count, e-mails received at the user's mail server must be repackaged (i.e., configured to be forwarded) and sent to the mobile device's radio address and unpackaged by the mobile device upon receipt. Hence, it would have been obvious to a person of ordinary skill in the art during the 1998 time frame to modify the steps recited in claim 8 and the proposed count to include the packaging feature recited in claim 11.

Claim 12 and its system analog claim 39 of the '378 patent depend from claims 5 and 33, respectively, and recite "configuring a set of filtering rules for use by the wireless redirector host system in determining whether messages should be redirected; and providing an access mechanism that allows a user of the wireless device to remotely configure and reconfigure the filtering rules." Adler describes in column 6 lines 51-64 that users of a mobile device can decide which messages are to be forwarded to the mobile device based on who the sender is. It would have been obvious during the 1998 time frame to a person of ordinary skill in the art to modify the subject matter defined by claims 5, 33, and the proposed count to allow users to set the criteria for filtering messages via the mobile device because such filtering is critical when limited bandwidth is available to the mobile user.

Claim 13 and its system analog claim 40 of the '378 patent depend from claims 12 and 39, respectively, and recite "wherein the access mechanism for remotely configuring and reconfiguring the filtering rules is a web-page interface." Figure 4-1 of AirMobile illustrates that the user is able to activate and deactivate filters at the host system by selecting or

deselecting a plurality of rules including a rule for filtering based on authorship. By 1998 it was well known that access to the host system via a web page would enable remote access to the filtering control page. Hence, it would have been obvious during the 1998 time frame to a person of ordinary skill in the art to modify the subject matter defined by claims 12, 39, and the proposed count to allow users to activate or deactivate the rules for filtering messages via the host system accessed through the web because such filtering is critical when limited bandwidth is available to the mobile user.

Claim 14 and its system analog claim 41 of the '378 patent depend from claims 5 and 33, respectively, and recite "configuring a user profile database for use by the wireless redirector host system in determining whether messages should be redirected; and providing an access mechanism that allows a system administrator of the messaging host system to remotely configure and reconfigure the user profile database." AirMobile teaches in the fourth paragraph of page 31 that server based filters for downloads can be changed via the client software so the LAN administrator is not needed. Consequently, it would have been obvious to a person of ordinary skill in the art during the 1998 time frame to modify the subject matter defined claims 5, 33, and the proposed count such that the filters can be configured and reconfigured by the client as well as the LAN administrator.

Claim 15 and its system analog claim 42 of the '378 application depend from claims 14 and 41, respectively, and recite "wherein the access mechanism for remotely configuring and reconfiguring the user profile database is a web-page interface." By 1998 it was well known that access to the host system via a web page would provide an administrator remote access to the filtering control page. Hence, it would have been obvious during the 1998 time frame to a person of ordinary skill in the art to modify the subject matter defined by claims 14, 41, and the proposed count to allow administrators to activate or deactivate the rules for

filtering messages via the host system accessed through the web because such filtering is critical when limited bandwidth is available to the mobile user.

Claim 16 and its system analog claim 43 of the '378 patent depend from claims 5 and 33, respectively, and recite "wherein the messages are E-mail messages, and the messaging host system is an E-mail host system." AirMobile illustrates in Figure 1-1 an e-mail host system connected to a wireless client via a wireless data network in order to wirelessly transmit e-mail messages. It would have been obvious to a person of ordinary skill in the art during the 1998 time frame to wirelessly transmit e-mail messages to a client from an e-mail host system.

Claim 17 and its system analog claim 44 of the '378 patent depend from claims 5 and 33, respectively, and recite "wherein the wireless device is a laptop computer." Figure 1-1 of AirMobile illustrates a wirelessly enabled computer having a display. It would have been obvious to a person of ordinary skill in the art during the 1998 time frame to use a laptop having a display and wireless communication to implement the steps of the proposed count and claims 5 and 33.

Claim 18 and its system analog claim 45 of the '378 patent depend from claims 5 and 33, respectively, and recite "wherein the wireless device is a two-way paging computer." Adler illustrates in Figure 2 and discloses in column 2 lines 15-19 a two-way pager for use as a wireless device. It would have been obvious to a person of ordinary skill in the art during the 1998 time frame to use a two-way paging computer and wireless communication to implement the steps of the proposed count and claims 5 and 33.

Claim 19 and its system analog claim 46 of the '378 patent depend from claims 18 and 45, respectively, and recite "wherein the two-way paging computer includes a wireless network interface for communicating with the wireless redirector host system via a wireless data network." Column 4 lines 11-25 of Adler disclose that the radio device 200 establishes a

"virtual session" with host server 205 in order to communicate with the host system. Hence, it would have been obvious to a person of ordinary skill in the art during the 1998 time frame in view of the count and claims 18 and 45 to use a wireless device configured to communicate with a host system via a wireless network.

Claim 20 and its system analog claim 47 of the '378 patent depend from claims 19 and 46, respectively, and recite "wherein the wireless redirector host system is coupled to the wireless data network via a wireless gateway system." Adler discloses a gateway 204 in Figure 4. Hence, it would have been obvious to a person of ordinary skill in the art during the 1998 time frame to modify the subject matter defined by the proposed count and claims 19 and 46 to include a gateway to translate between two communication protocols.

Claim 21 and its system analog claim 48 of the '378 patent depend from claims 5 and 33, respectively, and recite "wherein the wireless device is a capable of voice and data communications." Macko discloses at column 2 lines 13-15 that a mobile device can be a device configured to receive both voice and non-voice data messages. It would have been obvious in the 1998 time frame to a person of ordinary skill in the art to modify the subject matter defined by the count and claims 5 and 33 to limit the mobile devices to devices configured to receive both voice and non-voice data messages because cell phones with these capabilities were well known mobile devices able to transmit and receive messages.

Claim 22 and its system analog claim 49 of the '378 patent depend from claims 5 and 33, respectively, and recite "wherein the messaging host system is an Internet Service Provider." Claims 23 and its system analog claim 50 depend from claims 22 and 49, respectively, and recite "wherein the messages are e-mail messages, and the Internet Service Provider includes a mail server program." Similarly, claim 32 and its system analog claim 58 depend from claims 5 and 33, respectively and recite "wherein the messaging host system is a web-based e-mail hosting service." It was well known during the 1998 time frame that

Internet Service Providers (ISP) and e-mail hosting services provided their customers e-mail service. Hence, it would have been obvious during the 1998 time frame to modify the subject matter of the proposed count and claims 5 and 33 such that the host system is an ISP or e-mail hosting service.

Claim 25 and its system analog claim 52 of the '378 patent depend from claims 5 and 33, respectively, and recite "wherein the messaging host system and the wireless redirector host system are coupled via the Internet." The Eggleston patent teaches at column 4 lines 52-67, that a communications server (i.e., the redirector host system) and an e-mail post office (i.e., the messaging host system) can be coupled via a public data network such as the Internet. Hence, it would have been obvious during the 1998 time frame to modify the subject matter defined by the proposed count and claims 5 and 33 to couple the messaging system and the redirector system via the Internet because the physical location of those two systems does not effect their ability to communicate with one another.

Claim 26 and its system analog claim 53 depend from claims 5 and 33, respectively, and recite "detecting a message for the user of the wireless device at the messaging host system; forwarding a copy of the message from the messaging host system to the wireless redirector host system; receiving the forwarded message at the wireless redirector host system and applying a set of user-defined filtering rules that determine whether or not to redirect the message to the user's wireless device via a wireless network coupled to the wireless redirector host system; and if the filtering rules determine that the message is of the type that should be redirected, then redirecting the message to the user's wireless device by packaging the message in an electronic envelope that includes the wireless network address of the user's wireless device." Macko discloses a method of redirecting data items from a host system (130) to a mobile communication device (100). The host system configures one or more redirection events (column 8 lines 61-63); detects that a redirection event has occurred;

generates a redirection trigger; and, in response to the trigger, continuously redirects the data items from the host system to the communication device (column 8 line 67 - column 9 line 4). It would have been obvious to a person of ordinary skill in the art during the 1998 time frame to modify the method steps defined by the proposed count and claims 5 and 33 to include the redirection feature taught by Macko because Macko realized the benefit of forwarding e-mail to a mobile device when the user of the mobile device is away from his desktop computer. See column 8 line 57 - column 9 line 4 of Macko.

Further, AirMobile teaches on page 42 that messages can be filtered by "author" or "Post Office." It would have been obvious in the 1998 time frame to a person of ordinary skill in the art to modify the subject matter defined by the proposed count and claims 5 and 33 to limit messages forwarded to the mobile device in view of, for example, the author of the message because such filtering is critical when limited bandwidth is available to the mobile user.

Claim 27 and its system analog claim 54 depend from claims 26 and 53, respectively, and recite "providing a filter rules database for storing the user-defined filter rules; and providing an interface mechanism to the filter rules database through which the user may define and re-define the filtering rules." Pages 41-43 of AirMobile describe that users can configure the message filtering criteria which is stored by host system. It would have been obvious during the 1998 time frame to a person of ordinary skill in the art to modify the subject matter defined by claims 26, 53 and the proposed count to allow users to set the criteria for filtering messages because such filtering is critical when limited bandwidth is available to the mobile user.

Claims 28 and its system analog claim 55 depend from claims 27 and 54, respectively, and recite "wherein the interface mechanism is a web page interface." Figure 4-1 of AirMobile illustrates that the user is able to activate and deactivate filters at the host system

by selecting or deselecting a plurality of rules including a rule for filtering based on authorship. By 1998 it was well known that access to the host system via a web page would enable remote access to the filtering control page. Hence, it would have been obvious during the 1998 time frame to a person of ordinary skill in the art to modify the subject matter defined by claims 27, 54 and the proposed count to allow users to activate or deactivate the rules for filtering messages via the host system accessed through the web because such filtering is critical when limited bandwidth is available to the mobile user.

Claim 29 and its system analog claim 56 depend from claims 28 and 55, respectively, and recite "wherein the web page interface includes an activation/deactivation switch for turning on/off the operation of the wireless redirector host system for a particular user." SAM teaches on page 12-5 that the SAM system provides functionality where one user can change or delete the message routing of another user's messages. Consequently, it would have been obvious to a person of ordinary skill in the art during the 1998 timeframe to modify the method defined by the proposed count and claims 28 and 55 to allow redirection of e-mails to be activated/deactivated for a particular user. Routing functionality of this nature enables redirection of messages to be initiated/stopped by administrators and the like.

Claim 30 and its system analog claim 57 depend from claims 5 and 33, respectively, and recite "wherein the original message is a reply message to a message received at the wireless device from the message recipient." The proposed count is directed to reply messages. Consequently, claims 30 and 57 should be designated as corresponding to the proposed count.

Claim 31 depends from claim 5 and further recites "transmitting the original message from the wireless device to a wireless gateway via the wireless network; and transmitting the original message from the wireless gateway to the wireless redirector host system." Adler discloses a gateway 204 in Figure 4. Hence, it would have been obvious to a person of

ordinary skill in the art during the 1998 time frame to modify the subject matter defined by the proposed count and claim 5 to include a gateway to translate between two communication protocols.

Claim 35 of the '378 patent depends from claim 33 and recites "wherein the messaging host system detects the second copy stored in the first electronic mail account, determines that the second copy is a message originating from the wireless device, and is prevented from forwarding the second copy back to the wireless device." It would have been obvious during the 1998 time frame to a person of ordinary skill in the art to modify the subject matter defined by the proposed count and claim 33 to limit messages forwarded to the mobile device in view of the author of the message (i.e., the wireless device) because such filtering is critical when limited bandwidth is available to the mobile user. Retransmitting the wireless devices message is a waste of resources.

III. 37 CFR 41.202(a)(3)

Set forth below is a claim chart comparing applicants' claim 60 and Lazaridis's claim 28. Differences between the claims are shown in bold. An explanation of why the two-way obviousness test is satisfied is provided below the chart.

Lazaridis et al.'s claim 28	Applicants' Claim 60
A method for **redirecting** messages generated at a mobile data communication device by a message sender destined for a message recipient, comprising the steps of:	A method for **forwarding** messages generated at a mobile client by a message sender destined for a message recipient, comprising the steps of:
receiving a message, generated at the mobile **data communications device** by the message sender destined for the message recipient, at a **redirector** component associated with a host system, wherein messages generated at the host	receiving a message, generated at the mobile **client** by the message sender destined for the message recipient, at a **forwarding** component associated with a host system, wherein messages generated at the host system by the message sender

system by the message sender use a first address;	use a first address;
configuring **address information of the received message such that the received message uses the message sender's first address as the address originating the message, wherein messages generated at either the mobile data communications device or host system share the message sender's first address**; and	configuring **the received message such that the received message appears to the message recipient as if the received message originated at the sender's first address, wherein messages generated at either the mobile client or host system appear to originate at the message sender's first address**; and
redirecting the configured received message to the message recipient.	**forwarding** the configured received message to the message recipient.

Although these two claims do not use identical terminology, the claims define the same invention. For example, Lazaridis et al. use the terminology "mobile communication device" while applicants use the terminology "mobile client."

As can be seen from the arrows illustrated in Figures 1 and 2 of the three targeted Lazaridis et al. patents and column 5 lines 37-42, the term "redirect" is used by Lazaridis et al. to mean to change the destination of a data item from a first location to a second location. For example, in Figure 1, data item A is "redirected" from a host system to a mobile data communication device. Likewise, applicants use the term "forward" to convey that messages addressed to a user's post office box are directed to the user's mobile client. See Figure 3 and page 12 lines 1-28. Consequently, the claim recitations of "forwarding" and "redirecting" do not render Lazaridis et al.'s claim 28 and applicants' claim 60 patentably distinct.

Regarding the configuring step recited in Lazaridis et al.'s claim 28, Lazaridis et al. argued on page 17 of its October 12, 2000 Amendment in the application that matured into the '694 patent that:

> Simply put, the "transparency" concept makes the plurality of message senders believe that the user of the mobile data communication device is at, or nearby, the host system and is generating reply messages at the host system. In reality, however, the user is not at the host system, but instead is generating reply messages using the mobile communication device. So, instead of being at the host system, the user could be on the beach, playing golf, or anyone else away from the host system. By implementing the steps set forth in claim 1, the messages from the plurality of senders and the reply messages from the mobile data communication device are transparently redirected to and from the mobile device so that is appears to the message senders that the user of the mobile device is at the host system.

Applicant's claim 60 defines the same transparency feature. Consequently, the different language used in the configuring steps by Lazaridis et al. and applicants does not render Lazaridis et al.'s claim 28 and applicants' claim 60 patentably distinct.

IV. 37 CFR 41.202(a)(4)

Applicants will likely prevail on priority because this application is a divisional of application serial No. 08/574,528 filed on December 19, 1995 -- long prior to the earliest effective filing date of the four targeted Lazaridis et al. patents -- May 29, 1998.

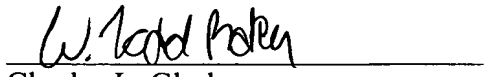
V. 37 CFR 41.202(a)(5)

Applicants' claims 33-114 were finally rejected under 35 USC 112, first paragraph. Applicants appealed the rejection, and, in a decision dated March 16, 2005, a three-judge panel of the Board of Patent Appeals and Interferences reversed the rejection. Hence, this requirement has been addressed.

VI. 37 CFR 41.202(a)(6)

Applicants' disclosure in the '528 application as filed is identical to its disclosure in the instant application as filed. Consequently, the '528 application provides a constructive reduction to practice within the scope of the proposed count.

Respectfully submitted,



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